

# **EXHIBIT 4**

1 UNITED STATES DISTRICT COURT

2 DISTRICT OF MINNESOTA

3  
4 Brock Fredin,

5 Plaintiff,

6 v.

No. 17-03058 (SRN/HB)

7 Lindsey Middlecamp,

8 Defendant.

9  
10 Brock Fredin,

11 Plaintiff,

12 v.

No. 18-cv-00466 (SRN/HB)

13 Grace Elizabeth Miller and

14 Catherine Marie Schaefer,

15 Defendants.

16  
17  
18 DEPOSITION OF BROCK FREDIN

19 Taken December 5, 2019

20 Scheduled for 9:30 a.m.

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23  
24  
25 REPORTED BY: JONATHAN WONNELL, RMR

<p style="text-align: right;">Page 50</p> <p>1 A No.</p> <p>2 Q A method to contact you through Match.com?</p> <p>3 A Yes.</p> <p>4 Q What other information is on the profile?</p> <p>5 A That's it.</p> <p>6 Q Do you have a copy of that profile?</p> <p>7 A I provided it in discovery.</p> <p>8 Q So other than the documents you provided,</p> <p>9 you don't have any other documents related to your</p> <p>10 Match.com profile?</p> <p>11 A Correct.</p> <p>12 Q What other user names did you use on</p> <p>13 Match.com?</p> <p>14 A Gopher Badge apparently was a name that</p> <p>15 I -- I may have used on Match.com. That's it.</p> <p>16 Q What about PaperTreadmill?</p> <p>17 A It's possible. I can't -- I can't</p> <p>18 remember. If that was in discovery, then it was.</p> <p>19 Q But that's one of your user names?</p> <p>20 A I know that it was one of my user names,</p> <p>21 yes.</p> <p>22 Q What about thumb_problems?</p> <p>23 A I believe so. Maybe.</p> <p>24 Q Well, what makes you question that?</p> <p>25 A I am not looking -- you didn't provide me</p>	<p style="text-align: right;">Page 52</p> <p>1 different?</p> <p>2 A Same or similar.</p> <p>3 Q How would they be different?</p> <p>4 A I don't know.</p> <p>5 Q Do you still have copies of those</p> <p>6 profiles?</p> <p>7 A I do not.</p> <p>8 Q Why did you close down your OkCupid</p> <p>9 profile?</p> <p>10 A I don't recall.</p> <p>11 Q What about Plenty of Fish?</p> <p>12 A I don't recall.</p> <p>13 Q Match.com?</p> <p>14 A The last time I had a Match.com profile</p> <p>15 was related to dating Grace Miller. The reason I</p> <p>16 deleted it was because Grace Miller continued to</p> <p>17 communicate obsessively with me by sending me direct</p> <p>18 e-mails and then alleging that my profile itself was</p> <p>19 a message to her. I deleted the profile that day or</p> <p>20 the next day, and that was the last time I had a</p> <p>21 Match.com profile. She wanted me to delete the</p> <p>22 profile.</p> <p>23 Q Did you have multiple profiles on a single</p> <p>24 site?</p> <p>25 A I don't remember.</p>
<p style="text-align: right;">Page 51</p> <p>1 exhibits, so I can't remember what I provided.</p> <p>2 Q Okay. But if it's in your answers to</p> <p>3 interrogatories, that would be accurate?</p> <p>4 A Absolutely, yes.</p> <p>5 Q Do you recall which site you used that</p> <p>6 user name on?</p> <p>7 A I do not.</p> <p>8 Q What about View Fine?</p> <p>9 A Yes. That sounds like I provided it in</p> <p>10 discovery.</p> <p>11 Q I'm reading this from your discovery, if</p> <p>12 there's any question.</p> <p>13 A Okay.</p> <p>14 Q My question, though, is: Which site was</p> <p>15 that used on?</p> <p>16 A I'm not sure.</p> <p>17 Q And then another one -- again, all one</p> <p>18 word -- ForYouAlwaysNow. Which site was that user</p> <p>19 name used on?</p> <p>20 A There was only three sites: Match.com,</p> <p>21 OkCupid and Plenty of Fish, that I believe the vast</p> <p>22 majority of those user names were used on. I can't</p> <p>23 remember specifically which site.</p> <p>24 Q Okay. Did those profiles contain the same</p> <p>25 information as the Match.com profile or were they</p>	<p style="text-align: right;">Page 53</p> <p>1 Q It's possible you did?</p> <p>2 A I don't remember.</p> <p>3 Q Why would you have had multiple profiles</p> <p>4 on a single site?</p> <p>5 A Generally speaking, I had one profile.</p> <p>6 For example, on Match.com, I had a profile, and I</p> <p>7 can't remember exactly, but I believe that I opened a</p> <p>8 new one after -- I can't remember. I believe that it</p> <p>9 was always one profile. I can't remember.</p> <p>10 Q You also have a profile on Fetlife.com?</p> <p>11 A I do not have profiles there anymore.</p> <p>12 Q But you did?</p> <p>13 A Yes.</p> <p>14 Q Using the user names: Science, Slutville</p> <p>15 and Slave Market; is that correct?</p> <p>16 A If it was in discovery, yes. I can't</p> <p>17 remember specifically.</p> <p>18 Q And what would be contained on those</p> <p>19 profiles?</p> <p>20 A The same or similar content.</p> <p>21 Q You also have another user name, Epicview;</p> <p>22 is that correct?</p> <p>23 A Yes.</p> <p>24 Q And that's on collarspace.com?</p> <p>25 A Again, that profile was -- I don't have</p>

<p style="text-align: right;">Page 54</p> <p>1 it; but, yes, I did.</p> <p>2 Q You also used Momentum Chaser?</p> <p>3 A If it was in discovery.</p> <p>4 Q What's the nature of the profile that you</p> <p>5 had on Collarspace.com? What information did it</p> <p>6 contain?</p> <p>7 A The same or similar.</p> <p>8 Q When you say "same or similar," I want to</p> <p>9 make sure that we've got a full list of the</p> <p>10 information that would be contained.</p> <p>11 So would your name, Brock Fredin, be</p> <p>12 included?</p> <p>13 A No.</p> <p>14 Q It would just be the user name?</p> <p>15 A Correct.</p> <p>16 Q Okay. Would it have generally your</p> <p>17 location, where you live?</p> <p>18 A Yes.</p> <p>19 Q It would contain -- would it contain</p> <p>20 height and weight?</p> <p>21 A Yes.</p> <p>22 Q Would it contain sexual preferences?</p> <p>23 A Yes.</p> <p>24 Q Would it contain frequent hangouts or</p> <p>25 places you like to go?</p>	<p style="text-align: right;">Page 56</p> <p>1 A Yes.</p> <p>2 Q And they would have sent you a</p> <p>3 confirmation e-mail --</p> <p>4 A Yes.</p> <p>5 Q -- that included that information?</p> <p>6 A Maybe, yes. Yup.</p> <p>7 Q According to your interrogatory answers,</p> <p>8 you maintained the CollarSpace profiles until</p> <p>9 approximately November of 2018?</p> <p>10 A I -- if that's in the interrogatory, that</p> <p>11 was based on review of my records.</p> <p>12 Q Okay. Did you frequently use that site to</p> <p>13 interact with others?</p> <p>14 A I wouldn't say frequent, but I did use it</p> <p>15 to interact with others.</p> <p>16 Q On a consistent basis?</p> <p>17 A I'm not sure how you define "consistent,"</p> <p>18 but I did communicate with others, you know, weekly</p> <p>19 maybe.</p> <p>20 Q And there's another profile on SA.com.</p> <p>21 What's "SA"?</p> <p>22 A I do not have the profile listed there</p> <p>23 anymore, but that is the same or similar profile.</p> <p>24 Q Is it seekingarrangements.com?</p> <p>25 A Yes.</p>
<p style="text-align: right;">Page 55</p> <p>1 A No.</p> <p>2 Q Would it contain a method to contact you?</p> <p>3 A Within the site itself.</p> <p>4 Q Did you ever share your e-mail or</p> <p>5 cellphone number on that site?</p> <p>6 A I'm not sure.</p> <p>7 Q Did you ever share it with users of that</p> <p>8 site that contacted you?</p> <p>9 A Generally, no.</p> <p>10 Q What other profile information would be</p> <p>11 contained that we haven't spoken about?</p> <p>12 A That's it.</p> <p>13 Q You set up the account "Epicview" on</p> <p>14 CollarSpace; is that correct?</p> <p>15 A Yes.</p> <p>16 Q Do you recall when you did that?</p> <p>17 A Generally probably 2015 or '14.</p> <p>18 Q And walk me through how one opens an</p> <p>19 account on CollarSpace.</p> <p>20 A Go to the site. There's a registration</p> <p>21 form. I do not believe that it had anything more</p> <p>22 than just simply registering through one single page.</p> <p>23 Q You're given a user name and password?</p> <p>24 A Correct.</p> <p>25 Q And that's something you set up?</p>	<p style="text-align: right;">Page 57</p> <p>1 Q And is the user name "Gator" the one you</p> <p>2 used?</p> <p>3 A Yes.</p> <p>4 Q And the Gator profile is the same or</p> <p>5 similar to Epicview?</p> <p>6 A In the sense that it provides biographical</p> <p>7 summary information.</p> <p>8 Q I think you mentioned before there's also</p> <p>9 pictures associated with these profiles?</p> <p>10 A Yes.</p> <p>11 Q Are they generally selfies that you've</p> <p>12 taken of yourself?</p> <p>13 A Yes.</p> <p>14 Q You have also a profile on Grindr,</p> <p>15 G-r-i-n-d-r, and Bumble?</p> <p>16 A Yes.</p> <p>17 Q User name Felix?</p> <p>18 A I had one. That was deleted in 2017.</p> <p>19 I've had subsequently similar Bumble profiles related</p> <p>20 to my name or my middle name.</p> <p>21 Q Why did you use the name Felix?</p> <p>22 A That's a good question. I named that</p> <p>23 after Supreme Court Justice Felix Frankfur.</p> <p>24 Q Why didn't you use your own name?</p> <p>25 A Because of Lindsey Middlecamp's -- I</p>

<p style="text-align: right;">Page 58</p> <p>1 believe at that time she had doxed my name. It's  2 actually how -- you know, I was very up front as soon  3 as I got online communication. I was always -- I was  4 up front as soon as I got to know someone that that  5 was not my real name.  6 Q You also maintained profiles on Tinder or  7 Hinge; is that correct?  8 A Yes.  9 Q Okay. And there the user names you used  10 were Brock, William or Eric, correct?  11 A Yes.  12 Q Why use the name Eric?  13 A It's a Norwegian first name, again, to  14 escape Lindsey Middlecamp's smear campaign against me  15 on the internet.  16 Q Is it generally true that all of these  17 profiles were active in 2016 from time to time?  18 A Not all of them, no. Some of the profiles  19 were just recent. For example, Hinge. I thought  20 that I had provided dates. If not, if you can give  21 me a specific user name, I can attempt to give you a  22 specific date in which that user name was active.  23 Q In a lot of these responses you say that  24 the profile was prepared on November 11th, 2019.  25 What is significant about November 11th, 2019?</p>	<p style="text-align: right;">Page 60</p> <p>1 Q We were talking about profiles on various  2 websites that you established.  3 (Fredin Exhibit 2 was marked for  4 identification.)  5 BY MR. BREYER:  6 Q So what's been handed to you is Exhibit 2,  7 which appears to be your Gator profile on  8 seekingarrangements.com -- is that correct?  9 A Yes.  10 Q And the general information contained in  11 the profile we spoke before, we see that here,  12 correct?  13 A Yes.  14 Q And this particular profile, you've  15 included two photos of yourself, right?  16 A Yes.  17 Q You took those photos?  18 A Yes.  19 Q And you used those photos on other  20 profiles; is that true?  21 A Yes.  22 Q Is the information contained in this  23 profile accurate?  24 A No.  25 Q What parts of it are not accurate?</p>
<p style="text-align: right;">Page 59</p> <p>1 A Can you read me exactly what it said?  2 Q Date, for example, I'm looking at the  3 Bumble, Tinder, Hinge response.  4 A So those three sets of profiles were  5 likely available on November 11th, 2019.  6 Q Well, you have the same response of  7 November 11th, 2019 with respect to all of the  8 profiles.  9 A Okay. Well, that was a mistake. Like,  10 for example, the Match.com stuff was all from 2015 or  11 early 2016. Again, plaintiff shall keep all that  12 stuff was 2015, 2016 and maybe 2017 a little bit.  13 I've had maybe two or three profiles going forward in  14 the last year to two years. If you want me to update  15 that response, I can.  16 MR. BREYER: Do you want to take a quick  17 break?  18 THE WITNESS: Okay.  19 (Whereupon, a recess was taken from 10:59  20 a.m. to 11:02 a.m.)  21 BY MR. BREYER:  22 Q Mr. Fredin, we just took a short break.  23 Just to remind you, you're still under oath. Do you  24 understand that?  25 A Yes.</p>	<p style="text-align: right;">Page 61</p> <p>1 A The net worth and annual income.  2 Q The remainder of it, though, is accurate?  3 A (Reading document). Yes.  4 Q You can put that one aside.  5 (Fredin Exhibit 3 was marked for  6 identification.)  7 BY MR. BREYER:  8 Q So you have in front of you Exhibit 3.  9 Exhibit 3 is a screen shot of CollarSpace.com; is  10 that correct?  11 A Yes.  12 Q Okay. And in the middle of the document  13 it has several pieces of information. Do those  14 pieces of information make up your profile on  15 CollarSpace?  16 A Yes.  17 Q Is the information depicted there  18 accurate?  19 A No.  20 Q Okay. What part is not accurate?  21 A Orientation, age, weight.  22 Q Is this information --  23 A State.  24 Q I'm sorry. Is this information that you  25 provided?</p>

<p style="text-align: right;">Page 62</p> <p>1 A The state is also inaccurate.</p> <p>2 Now that I mention that, maybe I</p> <p>3 overlooked the state here. The state here is not</p> <p>4 accurate as well. I didn't see that. In the Seeking</p> <p>5 Arrangements profile, the state and the city is</p> <p>6 inaccurate.</p> <p>7 Q What should it have been?</p> <p>8 A I believe that that city and state was</p> <p>9 taken from the time that the profile was opened.</p> <p>10 Here it says 2011, which at that time was accurate,</p> <p>11 but currently it is not accurate, just to be clear</p> <p>12 about that.</p> <p>13 Again, the same or similar issue with this</p> <p>14 profile; state, depending on whenever the profile was</p> <p>15 opened was accurate, but currently is inaccurate, and</p> <p>16 then the orientation is inaccurate as well.</p> <p>17 Q Okay. But the information shown in this</p> <p>18 profile is information that you entered, correct?</p> <p>19 A Yes.</p> <p>20 Q Okay. The remainder -- except for the</p> <p>21 state and orientation, the remainder of it's correct?</p> <p>22 A Yes.</p> <p>23 Q Okay. Why would you have identified your</p> <p>24 orientation in that way if it was inaccurate?</p> <p>25 A Potentially it was identified at the time</p>	<p style="text-align: right;">Page 64</p> <p>1 A I'm not sure. I'd have to review my</p> <p>2 records.</p> <p>3 Q What records would you review, the</p> <p>4 CollarSpace.com site?</p> <p>5 A I deleted all of them. If I have an</p> <p>6 account, I'm not sure. If I do, it's not relevant to</p> <p>7 this action.</p> <p>8 Q Can you state with any certainty whether</p> <p>9 you have an account or not --</p> <p>10 A I do.</p> <p>11 Q -- on CollarSpace.com?</p> <p>12 A I do.</p> <p>13 Q You're just using a different user name;</p> <p>14 is that true?</p> <p>15 A Any user name was potentially -- let's</p> <p>16 see. Let me check. It was the Momentum Chaser. I</p> <p>17 don't -- I don't know. I would have to check.</p> <p>18 They're all -- I don't use it actively anymore. I</p> <p>19 deleted these profiles, and I simply don't -- I don't</p> <p>20 know. I don't use them very often.</p> <p>21 (Fredin Exhibit 4 was marked for</p> <p>22 identification.)</p> <p>23 BY MR. BREYER:</p> <p>24 Q I'm showing you what's been marked as</p> <p>25 Exhibit 4. And it appears to be two e-mail messages</p>
<p style="text-align: right;">Page 63</p> <p>1 the profile was opened.</p> <p>2 Q And this is the profile of epicview. And</p> <p>3 epicview is your user name?</p> <p>4 A Yes.</p> <p>5 Q And is this just an example of a message</p> <p>6 exchange with an individual who uses the name</p> <p>7 GlitterBomb29?</p> <p>8 A Yes.</p> <p>9 Q Does this generally depict how these</p> <p>10 messages are exchanged on this site?</p> <p>11 A Yes.</p> <p>12 Q And are the messages contained on this</p> <p>13 site, are they saved to your computer?</p> <p>14 A No.</p> <p>15 Q Where are they saved to?</p> <p>16 A I'm not sure. The site.</p> <p>17 Q Do you still maintain the epicview user</p> <p>18 name?</p> <p>19 A No.</p> <p>20 Q When did that end?</p> <p>21 A I'm not sure.</p> <p>22 Q Do you still have a profile on</p> <p>23 CollarSpace.com?</p> <p>24 A Yes.</p> <p>25 Q What user name are you using?</p>	<p style="text-align: right;">Page 65</p> <p>1 to you from CollarSpace.com. Is that true?</p> <p>2 A Yes.</p> <p>3 Q And the e-mail address is</p> <p>4 brockf12@gmail.com.</p> <p>5 A Yes.</p> <p>6 Q Is that the e-mail that you were using in</p> <p>7 2016?</p> <p>8 A No. I used a different e-mail --</p> <p>9 Q What e-mail did you use --</p> <p>10 A -- for dating profiles.</p> <p>11 Q What e-mail did you use?</p> <p>12 A Field.gator@gmail.</p> <p>13 Q But the e-mail address depicted on</p> <p>14 Exhibit 4, the one I just read into the record, is</p> <p>15 your e-mail address, true?</p> <p>16 A Yes.</p> <p>17 Q This shows e-mails to you welcoming you to</p> <p>18 CollarSpace.com; is that right?</p> <p>19 A Yes.</p> <p>20 Q And it says for future reference your</p> <p>21 log-in information is, and then it uses or references</p> <p>22 a user name and a password; is that accurate?</p> <p>23 A Yes.</p> <p>24 Q And that's your user name and password,</p> <p>25 true?</p>

<p style="text-align: right;">Page 66</p> <p>1 A That is not accurate. This was created by  2 Catherine Schaefer in concert with Grace Miller. The  3 reason I knew this is because I did not use this  4 e-mail for dating profiles. Additionally, when I  5 went to review this profile name, I found that it was  6 associated with the smear campaign lodged against me  7 online.  8 Q What evidence do you have that my clients  9 created the user name epicviewfu?  10 A Because Catherine Schaefer had e-mailed me  11 directly taunting me, related to the harassment  12 restraining order proceeding and the smear campaign  13 online against me, and then suddenly these profiles  14 popped up within hours. The user name blackoutx2  15 references a, quote, unquote, blackout campaign, and  16 the x2 is pretty easily identifiable as times two,  17 which is two people, Catherine Schaefer and Grace  18 Miller.  19 And then the content in the profile  20 itself, which was false, defamatory information  21 referencing the smear campaign against me that  22 included my full name, e-mail address, phone number,  23 address, work information, yadda, yadda, yadda in the  24 profile itself. And then I also received direct  25 e-mails from epicview -- if it was FU or epicview --</p>	<p style="text-align: right;">Page 68</p> <p>1 believe that she was the creator of the account,  2 other than the fact that you believe she knew your  3 Gmail address?  4 A She referenced knowledge of Grace Miller.  5 Q She referenced knowledge of Grace Miller  6 where?  7 A Through an individual named Joshua Post  8 Lee.  9 Q Those communications are not on  10 CollarSpace.com, were they?  11 A They were on Facebook.  12 Q So is it your allegation that the fact  13 that she knew your e-mail address and the timing of  14 the Facebook posts led you to believe that she, being  15 Catherine Schaefer, created these CollarSpace  16 accounts?  17 A They were part and parcel to Grace Miller  18 and Catherine Schaefer's scheme to file bogus  19 restraining orders and then trying to bait me with  20 responses. Catherine Schaefer had the other profile  21 on this website CollarSpace.com. Her user name is  22 GlitterBomb29. And she had directly communicated  23 with me minutes or hours before opening these  24 profiles.  25 And then I later found out that she was</p>
<p style="text-align: right;">Page 67</p> <p>1 the discovery information, I'm not sure if that FU is  2 exactly accurate. I believe that user name it was  3 either this or there was a slight change. But I  4 reviewed e-mails also from this profile to the  5 epicview profile.  6 So what happened was they derived a new  7 user name based on the epicview profile to continue  8 to taunt me asking me if I had read this blackout  9 profile.  10 Q So your belief that Catherine Schaefer  11 and/or Grace Miller created the profile is because  12 they had your e-mail address?  13 A The reason that I know Catherine Schaefer  14 created this profile is because she had communicated  15 directly to me within minutes or hours of creating  16 this profile, and I had not communicated with anyone  17 else or rarely communicated with anyone else, so I  18 knew it was her.  19 And then --  20 Q Well, I want to stop you there. I want to  21 understand why you knew it was her. And you gave me  22 one of the reasons was because she had your Gmail  23 e-mail address. True?  24 A She knew my e-mail address, yes.  25 Q Okay. What was the other reason you</p>	<p style="text-align: right;">Page 69</p> <p>1 pursuing this vindictively by way of an individual  2 named Joshua Post Lee, who was the only other person  3 I had ever told about Grace Miller, and that's how  4 she obtained the information, and she contacted Grace  5 Miller while I was dating her and then used that  6 information to pursue her into filing bogus  7 restraining orders and then creating this smear  8 campaign by leaking this restraining order to, you  9 know, state-sponsored Twitter campaign that's  10 CardsAgstHrsmt.  11 But the other reason that this was  12 associated with Catherine Schaefer is because the  13 content itself was specific to knowledge that only  14 Catherine Schaefer could have had about me at that  15 time, including the fact that I had an e-mail  16 address, my phone number, my work location, and then  17 my, you know, interests, my dating interests; only  18 information that Catherine Schaefer would have known  19 at that time, as well as what I later found out to be  20 her connections to Joshua Post Lee.  21 Q And so, again, I want you to focus on how  22 it is that she was the one in your mind that set up  23 these accounts. And, again, you've told me that she  24 is aware of your e-mail address as brockf12@gmail.com  25 and then it's the proximity of the Facebook posts</p>



<p style="text-align: right;">Page 70</p> <p>1 that followed. Is that accurate?</p> <p>2 A No. There were no Facebook posts. I have</p> <p>3 no idea what was going on.</p> <p>4 Q So other than your belief that she knew</p> <p>5 your Gmail address, what other evidence, as opposed</p> <p>6 to speculation, do you have that she created the</p> <p>7 account?</p> <p>8 A Her admission to communicating to me at</p> <p>9 that time on the same website within hours of these</p> <p>10 profiles popping up, in addition to the same tactics</p> <p>11 associated with Lindsey Middlecamp's revenge</p> <p>12 pornography on CardsAgstHrsmt where she posted naked</p> <p>13 photos of men, including underage boys, which is</p> <p>14 absolutely disgusting.</p> <p>15 Q Tell me about the communication that</p> <p>16 Catherine Schaefer purportedly sent to you on</p> <p>17 CollarSpace.com that you just referenced.</p> <p>18 A She sent two or three e-mails saying that</p> <p>19 she would see me in court and claiming that it would</p> <p>20 be, quote, unquote, fun.</p> <p>21 Q Where are those e-mails?</p> <p>22 A I provided those e-mails in discovery.</p> <p>23 Q If you didn't produce those e-mails in</p> <p>24 discovery, where are they?</p> <p>25 A I did provide them. They were on my</p>	<p style="text-align: right;">Page 72</p> <p>1 epicviewfu profile and the BlackOutx2 profile as well</p> <p>2 as the GlitterBomb29 profile.</p> <p>3 Q Yes. But I want to talk about the two or</p> <p>4 three e-mails that you received from her that you</p> <p>5 referenced before. Was that from her GlitterBomb</p> <p>6 account?</p> <p>7 A Those e-mails were from epicviewfu or</p> <p>8 BlackOutx2.</p> <p>9 (Fredin Exhibit 5 was marked for</p> <p>10 identification.)</p> <p>11 BY MR. BREYER:</p> <p>12 Q So I'm showing you Exhibit 5, a document</p> <p>13 that you produced to us. Is this the message you</p> <p>14 were referencing in your earlier answer?</p> <p>15 A Yes.</p> <p>16 Q And, again, it's a message from Blackoutx2</p> <p>17 to you, correct?</p> <p>18 A Yes.</p> <p>19 Q And you believe BlackOutx2 is Catherine</p> <p>20 Schaefer?</p> <p>21 A I know that's Catherine Schaefer.</p> <p>22 Q And, again, from this message, how do you</p> <p>23 know it's Catherine Schaefer?</p> <p>24 A Because Catherine Schaefer references the</p> <p>25 Ramsey County District Court action which she filed</p>
<p style="text-align: right;">Page 71</p> <p>1 computer. I saved them.</p> <p>2 Q You still have them, correct?</p> <p>3 A I provided PDF printouts of those e-mails.</p> <p>4 I still have them. You have them.</p> <p>5 Q And these were messages sent to you</p> <p>6 through the CollarSpace.com site?</p> <p>7 A Yes.</p> <p>8 Q When?</p> <p>9 A Late May 2016 and early June 2016.</p> <p>10 Q Okay. Anything else that you can think of</p> <p>11 as evidence that connects Catherine Schaefer to these</p> <p>12 profiles, either epicviewfu or BlackOutx2?</p> <p>13 A Her self-admission in Ramsey County</p> <p>14 District Court that she had communicated with me</p> <p>15 through that site. At the same time, her knowledge</p> <p>16 of my dating interests. Her intimate knowledge and</p> <p>17 obsession with me. Her knowledge of Grace Miller,</p> <p>18 which was knowledge that no one else could have.</p> <p>19 Essentially, her direct admissions in Ramsey County</p> <p>20 District Court of all of the facts surrounding these</p> <p>21 profiles.</p> <p>22 Q When she communicated to you through these</p> <p>23 two or three e-mails we talked about earlier, was it</p> <p>24 through her GlitterBomb account?</p> <p>25 A She communicated with me through this</p>	<p style="text-align: right;">Page 73</p> <p>1 within days of this e-mail. "We will be coming soon"</p> <p>2 mentions a reference to the smear campaign as well as</p> <p>3 the bogus restraining orders they filed.</p> <p>4 Q And to be clear, the entirety of the</p> <p>5 message is: "We know about you. We will be coming</p> <p>6 soon." Is that correct?</p> <p>7 A Yes.</p> <p>8 Q There's no reference to any sort of smear</p> <p>9 campaign or court case, is there?</p> <p>10 A It's pretty clear "we will be coming soon"</p> <p>11 references the subsequent Ramsey County Court action</p> <p>12 Catherine Schaefer filed against me.</p> <p>13 Q And that's how you interpreted it?</p> <p>14 A At the time, I did not know that. I would</p> <p>15 have to check exactly when she filed that restraining</p> <p>16 order, but I did find that out as soon as I was</p> <p>17 served with it.</p> <p>18 Q So, again, you're linking this based on a</p> <p>19 particular connection between this message and the</p> <p>20 filing of the HRO?</p> <p>21 A As well as background information related</p> <p>22 to Catherine Schaefer. For example, "We know about</p> <p>23 you" references her stalking with me and the fact</p> <p>24 that she contacted Grace Miller in 2015.</p> <p>25 Q How? How does it reference that?</p>



<p style="text-align: right;">Page 74</p> <p>1 A The "We know about you," again, is a 2 reference to the subsequent smear campaign against me 3 as well as their efforts to contact any and all 4 people that they knew that I had dated. 5 Q Why do you think she sent this as opposed 6 to anyone else that knew you or of you or interacted 7 with you on CollarSpace? 8 A Because of the direct timeline between the 9 Glitterbomb communication and the -- these profiles 10 popping up as well as information related to Joshua 11 Post Lee, who admitted to acting in concert with 12 Catherine Schaefer to provide her knowledge. 13 Q To the best you can recall, what were the 14 communications from Catherine Schaefer using the user 15 name GlitterBomb to you in May and June of 2016? To 16 the best of your knowledge, what did they say? 17 A I don't -- I don't recall exactly. But I 18 do remember her profile. 19 Q Well, do you remember what the contents of 20 those e-mails were that makes you think that she was 21 also the creator of BlackOutx2 and epicviewfu? 22 A I don't know. It just all lined up. It 23 was pretty obvious to me. I'm not that smart, but it 24 was pretty clear. 25 Q Other than it all lining up, any other</p>	<p style="text-align: right;">Page 76</p> <p>1 to alter those profiles? 2 A Did I have the ability? I'd never 3 checked, so no, I did not have the ability. I did 4 not log in. In fact, I didn't read that e-mail until 5 I had to for purposes of providing it for discovery. 6 The e-mail itself was never read or clicked into 7 because I knew that it was click bait. But pursuant 8 to Magistrate Judge Bowbeer's court order, I had to 9 click in it to produce the PDF, and I did so at that 10 point, which was a month ago. 11 Q To log into CollarSpace, you just need a 12 user name and a password, correct? 13 A Yes. 14 Q And that will give you access to the 15 profile? 16 A Yes. 17 Q And you can close the profile down with 18 these credentials? 19 A I'm not sure. 20 Q You can alter the profile; is that 21 correct? 22 A Yes, you can. 23 Q And you can close out the account? 24 A I don't -- I think so. 25 Q Well, Mr. Fredin, you testified earlier</p>
<p style="text-align: right;">Page 75</p> <p>1 evidence that she's the creator of those profiles? 2 A Just her own admissions in Ramsey County 3 District Court. 4 Q You're not alleging that Grace Miller or 5 Lindsey Middlecamp created those profiles, are you? 6 A I'm alleging that Grace Miller acted in 7 concert indirectly. 8 Q But she didn't create the profiles? 9 A Correct. 10 Q The password for both epicfu and 11 BlackOutx2 is lower case C, lower case J, 050589. Is 12 that a password that you've used? 13 A No. 14 Q Do either of those letters or numbers have 15 any meaning to you? 16 A 050589 have absolutely no meaning to me 17 whatsoever. I would assume that maybe they're 18 someone's birthdate. The "C," I guess -- I never 19 actually looked at the password before, but now that 20 I do, maybe Catherine Schaefer; her first name is 21 "C." That password is nothing I've used before, and 22 I've never used passwords of that syntax. 23 Q When you received these e-mails opening 24 the profiles of epicviewfu, BlackOutx2, along with 25 the passwords, you then had the ability, did you not,</p>	<p style="text-align: right;">Page 77</p> <p>1 that you had an account at CollarSpace and you closed 2 it down. 3 A That's true, yes, I did. I -- what I mean 4 by that is the fact that -- I don't want to get into 5 some -- the short answer is yes, you can delete it, 6 making it not available publicly. I believe that the 7 data is still contained on the servers that the site 8 is hosted on. 9 Q When you received messages from BlackOutx2 10 and epicviewfu, were they sent to your Gmail account? 11 A Yes. 12 Q And you opened them? 13 A Can you restate the question before that 14 just to make sure I'm understanding? 15 Q When you received messages from these two 16 user name accounts at CollarSpace, you would open the 17 messages and read them, correct? 18 A No, that's not true. I opened one or two 19 of them, and then I received them in my mail, and 20 they were all unread. So generally, no, but I did 21 read a few of them. Reading them from my own e-mail 22 in-box, because they were forwarded to me from the 23 site. 24 (Fredin Exhibit 6 was marked for 25 identification.)</p>

<p style="text-align: right;">Page 78</p> <p>1 BY MR. BREYER:</p> <p>2 Q Exhibit 6, again, is a document that you</p> <p>3 produced to us, and it appears to be the in-box for</p> <p>4 the CollarSpace account. Is that accurate?</p> <p>5 A Yes.</p> <p>6 Q Okay.</p> <p>7 A That's my Gmail -- no, I'm sorry. That's</p> <p>8 my Gmail in-box, just to be clear.</p> <p>9 Q This is your Gmail in-box?</p> <p>10 A Yes.</p> <p>11 Q Okay. So when messages are sent to you on</p> <p>12 CollarSpace.com, they appear in your Gmail in-box?</p> <p>13 A They are forwarded from the site to the</p> <p>14 e-mail associated with the profile. In this case</p> <p>15 because Catherine Schaefer had associated my e-mail</p> <p>16 with the profile, they would have been forwarded to</p> <p>17 my Gmail in-box.</p> <p>18 Q So when the accounts were opened in your</p> <p>19 name and you received these welcome e-mails along</p> <p>20 with the passwords and user names, is it your</p> <p>21 testimony that you did not open them?</p> <p>22 A I did open a few of them. I -- you can</p> <p>23 see the information without necessarily reading them</p> <p>24 and clicking into them. They were generally unread</p> <p>25 messages in my Gmail in-box.</p>	<p style="text-align: right;">Page 80</p> <p>1 A They're here in this -- in these e-mails</p> <p>2 that are sent.</p> <p>3 Q Why didn't you produce them?</p> <p>4 A I did produce them.</p> <p>5 Q You believe you produced the messages?</p> <p>6 A These are the messages. I produced the</p> <p>7 messages to the best of my ability. You know,</p> <p>8 without hiring a private investigator and going</p> <p>9 through a very costly forensic data service, it would</p> <p>10 be difficult -- I can't log into these profiles, so</p> <p>11 all of this data is available through the servers</p> <p>12 that this website uses, which is Cloudflare.</p> <p>13 Q Okay. But you didn't produce those to us?</p> <p>14 A I was unable to, because I did not</p> <p>15 subpoena Cloudflare for the data. But I did produce</p> <p>16 the e-mails in discovery in PDF formats and screen</p> <p>17 shots, to the best of my ability.</p> <p>18 There were also several hundred other</p> <p>19 e-mails that were sent that Gmail may have deleted</p> <p>20 between October 17, 2018 and June 12, 2019, because</p> <p>21 my in-box at that time -- and I was unable to buy</p> <p>22 extra space. So Gmail deleted a bunch of e-mails.</p> <p>23 Now that I remember that -- and I will include that</p> <p>24 in the deleted log.</p> <p>25 Q Mr. Fredin, your allegation with respect</p>
<p style="text-align: right;">Page 79</p> <p>1 Q On the first page it shows that the</p> <p>2 Welcome to CollarSpace e-mail was sent to you on</p> <p>3 June 2nd, correct?</p> <p>4 A Yes.</p> <p>5 Q And we're talking about June 2nd, 2016; is</p> <p>6 that right?</p> <p>7 A Yes.</p> <p>8 Q Okay. And immediately you receive several</p> <p>9 other messages from other users of that website,</p> <p>10 true?</p> <p>11 A Yes.</p> <p>12 Q And you opened some of them, correct?</p> <p>13 A Two, maybe.</p> <p>14 Q Do you recall which two?</p> <p>15 A I do not.</p> <p>16 Q You have alleged in this lawsuit that you</p> <p>17 received unsolicited messages for sex. Are these the</p> <p>18 messages you're referring to?</p> <p>19 A These messages -- yes. They included</p> <p>20 references to sexual activity, with the e-mails</p> <p>21 themselves that were forwarded to the account. For</p> <p>22 example, the user names themselves referenced sexual</p> <p>23 activity, and they're being sent directly to my</p> <p>24 e-mail in-box.</p> <p>25 Q Where are those messages?</p>	<p style="text-align: right;">Page 81</p> <p>1 to unsolicited -- with respect to your allegations</p> <p>2 that you were solicited for sex, were those</p> <p>3 solicitations all through CollarSpace.com?</p> <p>4 A I also received text messages and people</p> <p>5 knocking on my door.</p> <p>6 Q From which user did you receive these</p> <p>7 solicitations, looking at this document?</p> <p>8 A These users that are listed via their user</p> <p>9 name, text messages from random numbers. I did not</p> <p>10 know who they were. And I did not know who was</p> <p>11 knocking on my door.</p> <p>12 Q Which specific users sent you the</p> <p>13 unsolicited --</p> <p>14 A The user name --</p> <p>15 Q -- e-mails for sex?</p> <p>16 A Yeah. All of these user names here that</p> <p>17 are listed in the e-mails.</p> <p>18 Q But you said you didn't open most of</p> <p>19 these.</p> <p>20 A You could easily view them in my Gmail</p> <p>21 in-box without reading them directly. I was afraid</p> <p>22 to read them directly because of the nature of the</p> <p>23 nonconsensual sexual soliciting Catherine Schaefer</p> <p>24 executed on me.</p> <p>25 Q But it's true, is it not, that the</p>

<p style="text-align: right;">Page 82</p> <p>1 document you produced to us as Exhibit 6 doesn't</p> <p>2 contain any of that information?</p> <p>3 A No, it does.</p> <p>4 Q Where?</p> <p>5 A Here, in each e-mail.</p> <p>6 Q Where is the solicitation? Read it to me.</p> <p>7 A Every single e-mail uses solicitation.</p> <p>8 Q Looking at Exhibit 6, read me the</p> <p>9 solicitation.</p> <p>10 A Okay. New message on CollarSpace.com for</p> <p>11 BlackOutx2 from loyalsubformaster. "BlackOutx2, you</p> <p>12 received a message on CollarSpace.com from</p> <p>13 loyalsub4Master at 6/2/16 at 7:00 a.m. You can click</p> <p>14 here. Next message."</p> <p>15 Do you want me to continue?</p> <p>16 Q Point out to me in that sentence or in</p> <p>17 that line item where the solicitation is.</p> <p>18 A "New message on CollarSpace.com for</p> <p>19 BlackOutx2 from loyalsub4Master." Also same message</p> <p>20 from a user name Makemurwife. Same message from</p> <p>21 dianefritz8395. Same message from atyourfeet1965.</p> <p>22 Same message from alanna020 with time stamps and the</p> <p>23 content related there into the message that is</p> <p>24 included in each e-mail.</p> <p>25 Q So is this the entirety of the messages</p>	<p style="text-align: right;">Page 84</p> <p>1 me for non-consensual sexual activity to each of</p> <p>2 these users and then the time stamps included</p> <p>3 messages to that profile itself, as well as people</p> <p>4 knocking on my door and receiving a number of phone</p> <p>5 calls and text messages related to non-consensual</p> <p>6 sexual activity.</p> <p>7 (Fredin Exhibit 7 was marked for</p> <p>8 identification.)</p> <p>9 BY MR. BREYER:</p> <p>10 Q You've been handed Exhibit 7. And, again,</p> <p>11 it's a different form, but it is messages that you</p> <p>12 had provided to us from CollarSpace.com; is that</p> <p>13 correct?</p> <p>14 A Yes.</p> <p>15 Q Okay. These messages, too, just indicate</p> <p>16 that you received a message, but the message itself</p> <p>17 is not included; is that right?</p> <p>18 A The message is contained here in the sense</p> <p>19 that -- by way of sending a message to my Gmail</p> <p>20 in-box, it is a message itself from the user</p> <p>21 requesting non-consensual sexual activity.</p> <p>22 Q And that's my question, is where in this</p> <p>23 message, this document you provided to us, does it</p> <p>24 show --</p> <p>25 A Yeah, the entire -- the entire message --</p>
<p style="text-align: right;">Page 83</p> <p>1 from these users?</p> <p>2 A No. Between October 17th and June 12th,</p> <p>3 2019, there were hundreds of other messages that were</p> <p>4 also in here but were deleted because of size</p> <p>5 restrictions on Gmail. I produced all of the saved</p> <p>6 e-mails that I received. It was so overwhelming that</p> <p>7 I did not save them. But the revenge pornography law</p> <p>8 was implemented on August 1st, 2018, and there were</p> <p>9 several messages after -- I'm sorry. That was 2017.</p> <p>10 There were several messages after that date that were</p> <p>11 in conflict of that law.</p> <p>12 Q You state that had you saved these</p> <p>13 messages. How did you save them?</p> <p>14 A Screen shots.</p> <p>15 Q And is Exhibit 6 a screen shot?</p> <p>16 A Correct.</p> <p>17 Q Okay. And so my question with respect to</p> <p>18 these messages, where is the content or the substance</p> <p>19 of the message, or is this it?</p> <p>20 A The messages, I believe, were also the</p> <p>21 ones that were still saved in my Gmail were</p> <p>22 available, and I clicked into them, and then I saved</p> <p>23 them as PDFs and provided them in discovery. The</p> <p>24 content that offered the sexual solicitation was part</p> <p>25 and parcel to the user name BlackOutx2, which offered</p>	<p style="text-align: right;">Page 85</p> <p>1 Q Let me -- let me finish the question --</p> <p>2 A Oh, sorry.</p> <p>3 Q -- and then you can answer.</p> <p>4 A I'm sorry.</p> <p>5 Q Otherwise, the court reporter can't take</p> <p>6 down what we say.</p> <p>7 So these messages which you provided which</p> <p>8 are now part of the Exhibit 7, are these messages --</p> <p>9 are these the messages you claim contain</p> <p>10 non-consensual sexual solicitations?</p> <p>11 A Yes.</p> <p>12 Q Are there any other messages that you make</p> <p>13 the same claim?</p> <p>14 A There are text messages, phone calls.</p> <p>15 There are messages, I believe, on Grindr related to</p> <p>16 this as well. That profile was deleted. I was</p> <p>17 unable to obtain information.</p> <p>18 Q But Catherine Schaefer didn't post a</p> <p>19 profile of you on Grindr, did she?</p> <p>20 A No.</p> <p>21 Q So again, the message that we see on</p> <p>22 Exhibit 7, that is, in fact, your claim for</p> <p>23 nonconsensual sexual activity?</p> <p>24 A The entire message, correct.</p> <p>25 Q And this Exhibit 7 shows the entirety of</p>

<p style="text-align: right;">Page 86</p> <p>1 three separate messages, correct?</p> <p>2 A Correct.</p> <p>3 Q Is that true?</p> <p>4 A Yes.</p> <p>5 Q There's no more to these messages that</p> <p>6 you're claiming makes up your claim?</p> <p>7 A False. No. That's not true.</p> <p>8 Q What is it?</p> <p>9 A The messages are part and parcel to being</p> <p>10 attached to the profile itself Blackoutx2, which was</p> <p>11 offering my full name, my e-mail, phone number,</p> <p>12 dating interests, to hundreds of these users who</p> <p>13 then, in fact, messaged me by way of communicating</p> <p>14 through the profile which forwarded the message to</p> <p>15 me.</p> <p>16 Q And the entirety of the message is what we</p> <p>17 see in Exhibit 7?</p> <p>18 A The message itself, potentially the direct</p> <p>19 content related, is contained on servers or in these</p> <p>20 profiles themselves. I did not log in to these</p> <p>21 profiles for obvious reasons.</p> <p>22 Q Okay. So you did not log in, and you did</p> <p>23 not review the content of these mechanical's; is that</p> <p>24 true?</p> <p>25 A That's true.</p>	<p style="text-align: right;">Page 88</p> <p>1 A I would not characterize it in that way.</p> <p>2 I believe that the entirety of the message is here,</p> <p>3 and then there's a secondary message that's available</p> <p>4 on the website itself if you click on it.</p> <p>5 Q Okay. But you did not view the secondary</p> <p>6 messages, as you call them?</p> <p>7 A That's correct.</p> <p>8 Q So the only messages you reviewed are the</p> <p>9 ones that are depicted here in Exhibit 7?</p> <p>10 A Yes, that's true. In addition to looking</p> <p>11 at the profiles that they were messaging, BlackOutx2,</p> <p>12 which I could view publicly.</p> <p>13 Q So you went to the profile BlackOutx2?</p> <p>14 A Yes.</p> <p>15 Q Did you also go to the profile epicviewfu?</p> <p>16 A Yes.</p> <p>17 Q And upon viewing those profiles, you</p> <p>18 became aware that the profile was created for you?</p> <p>19 A I wouldn't characterize it as for me, but</p> <p>20 they were characterized as a --</p> <p>21 Q They were your profile?</p> <p>22 A No, absolutely not. They were produced by</p> <p>23 Catherine Schaefer as part and parcel to her smear</p> <p>24 campaign against me.</p> <p>25 Q So upon reviewing these profiles, why</p>
<p style="text-align: right;">Page 87</p> <p>1 Q Is there any message at all in which you</p> <p>2 reviewed the content?</p> <p>3 A I did -- I mean, the content of the</p> <p>4 message is the message itself that's forwarded to me,</p> <p>5 but what you're speaking of is the secondary body of</p> <p>6 the e-mail to BlackOutx2 or epicviewfu, and that is</p> <p>7 contained on that site. The message contains the</p> <p>8 subject, address, body. These messages themselves</p> <p>9 obviously contain a body, which is requesting sexual</p> <p>10 activity, but there's a secondary body of the direct</p> <p>11 content of the message that's on the website.</p> <p>12 Q Okay. So I just want to make this very</p> <p>13 clear.</p> <p>14 So the document showing the in-box screen</p> <p>15 shot shows notifications of messages to you through</p> <p>16 CollarSpace.com, correct?</p> <p>17 A I would not characterize it as</p> <p>18 notification of a message. I would characterize it</p> <p>19 as a direct message offering sexual solicitation.</p> <p>20 Q So there's a direct message that's</p> <p>21 depicted in the in-box in that exhibit, true?</p> <p>22 A Yes.</p> <p>23 Q Okay. That is not the entirety of the</p> <p>24 message, is it? You would have to open the message</p> <p>25 up and view its contents; is that accurate?</p>	<p style="text-align: right;">Page 89</p> <p>1 didn't you take them down?</p> <p>2 A Because I did not want to add any</p> <p>3 additional information to the profiles themselves</p> <p>4 because they were not associated with me whatsoever,</p> <p>5 and it would be a conflict for me to attempt to</p> <p>6 remove these profiles because of the nature of the</p> <p>7 profiles themselves.</p> <p>8 Q You said the profiles weren't associated</p> <p>9 with you. They did not contain any personal</p> <p>10 information of yours?</p> <p>11 A What I mean by that is I did not create</p> <p>12 the profiles in any way whatsoever. I had no</p> <p>13 knowledge of their creation until I found out that</p> <p>14 Catherine Schaefer had produced them. And so if I</p> <p>15 tried to remove the profiles, it would be, you know,</p> <p>16 adding my information to profiles in which I did not</p> <p>17 create. I did not want any confusion whatsoever over</p> <p>18 the fact that I did not create these profiles.</p> <p>19 Q So looking back at Exhibit 5, there is a</p> <p>20 profile in the middle of that document. Do you see</p> <p>21 that?</p> <p>22 A Yes.</p> <p>23 Q Can you tell from Exhibit 5 whose profile</p> <p>24 that is?</p> <p>25 A It is BlackOutx2.</p>

<p style="text-align: right;">Page 94</p> <p>1 Q So you're looking at Exhibit 7 again?</p> <p>2 A Exhibit 6.</p> <p>3 Q So when you say --</p> <p>4 A Exhibit 7.</p> <p>5 Q So you say "text messages," then, do I</p> <p>6 infer that to mean that you would get a notification</p> <p>7 in your in-box but you would also get a text message</p> <p>8 with the same information?</p> <p>9 A At that time, that's the way that I had it</p> <p>10 set up, as well as receiving several other text</p> <p>11 messages related to this, people contacting me, that</p> <p>12 I ignored.</p> <p>13 Q So the text messages, again, are --</p> <p>14 contain the same messages that we saw in Exhibit 6?</p> <p>15 A Yes. And the phone that I was using, I</p> <p>16 never turned on again after the property was</p> <p>17 returned. So those text messages themselves are</p> <p>18 simply unavailable.</p> <p>19 Q Where is that phone now?</p> <p>20 A That phone was deleted, and I believe that</p> <p>21 it was sold on the internet.</p> <p>22 Q When was it deleted?</p> <p>23 A When I sold the phone on the internet, I</p> <p>24 deleted the data associated with it.</p> <p>25 Q You didn't keep any copies?</p>	<p style="text-align: right;">Page 96</p> <p>1 phone that I had when all of this went down.</p> <p>2 But I ignored all of these text messages</p> <p>3 that were forwarded and utilized simply the e-mails</p> <p>4 themselves.</p> <p>5 Q Okay. So you ignored them and you did not</p> <p>6 read them?</p> <p>7 A I read them.</p> <p>8 Q Okay. And you read them using the phone?</p> <p>9 A Correct. They were push notifications on</p> <p>10 the phone.</p> <p>11 Q Okay. And the content of the text</p> <p>12 message, is it the same as what's depicted in</p> <p>13 Exhibit 6?</p> <p>14 A Yes. In addition, I had received several</p> <p>15 other direct text messages from individuals.</p> <p>16 Q But let's just stick with the</p> <p>17 CollarSpace.com text messages. You did not open</p> <p>18 those messages to read the secondary content?</p> <p>19 A Correct.</p> <p>20 Q The other text messages that you</p> <p>21 referenced, where did they come from?</p> <p>22 A Numbers. Telephone numbers.</p> <p>23 Q Do you know where those text messages came</p> <p>24 from or how they obtained your phone number to text</p> <p>25 you?</p>
<p style="text-align: right;">Page 95</p> <p>1 A I didn't turn on the phone after -- well,</p> <p>2 let me back up. I don't recall if I turned it on. I</p> <p>3 did not turn on the phone. I sold it on the</p> <p>4 internet. I don't remember, actually.</p> <p>5 Q Who did you sell it to?</p> <p>6 A I don't remember.</p> <p>7 Q How did you sell it on the internet?</p> <p>8 A I don't remember.</p> <p>9 Q When did you sell it on the internet?</p> <p>10 A For all intents and purposes, when I</p> <p>11 received the property -- let me back up.</p> <p>12 When I received the property back, because</p> <p>13 there were so many items, they took 60 to 70 items,</p> <p>14 that it was overwhelming. And so the phone that this</p> <p>15 stuff was on, I had like five or six phones. I</p> <p>16 couldn't remember exactly which phone I was using at</p> <p>17 that time.</p> <p>18 I sold one phone which could have been</p> <p>19 that phone, and I may have the phone still in</p> <p>20 property. My life has been sort of in whack. So I</p> <p>21 don't know exactly where it is. I believe that it's</p> <p>22 in storage, in a storage unit in St. Louis Park</p> <p>23 because my mom, before she died, had it, and she put</p> <p>24 all of my stuff in a storage unit. And I had one or</p> <p>25 two phones, and I don't recall if that was the exact</p>	<p style="text-align: right;">Page 97</p> <p>1 A Yeah. I mean, my number was contained in</p> <p>2 the profile itself, and so I received a couple text</p> <p>3 messages from the profile.</p> <p>4 Q And where are those text messages? Are</p> <p>5 they on the phone?</p> <p>6 A They were ridiculous messages. I deleted</p> <p>7 them immediately. I did not respond to them. I</p> <p>8 believe that they were on the phone, but I deleted</p> <p>9 them as soon as I received them and ignored them.</p> <p>10 Q Okay. So focusing just on the text</p> <p>11 messages. You got text messages through the</p> <p>12 CollarSpace --</p> <p>13 A I received, like, two text messages</p> <p>14 through the only available phone number that they</p> <p>15 knew that I had, and I deleted those messages</p> <p>16 instantly, and they were associated with the same</p> <p>17 campaign.</p> <p>18 Q Okay. And is that the entirety of the</p> <p>19 text messages, then, that --</p> <p>20 A Yes, in addition to all of the push</p> <p>21 notifications and direct text messages from these</p> <p>22 e-mails.</p> <p>23 Q Right. We've talked about the push</p> <p>24 notifications that ended up in your in-box and were</p> <p>25 texted to you, which are identical to the ones that</p>



<p style="text-align: right;">Page 110</p> <p>1 Gmail account, correct?</p> <p>2 A Have other people used it? I'm the only</p> <p>3 one who uses that Gmail account.</p> <p>4 Q Okay.</p> <p>5 (Fredin Exhibit 9 was marked for</p> <p>6 identification.)</p> <p>7 BY MR. BREYER:</p> <p>8 Q So what I'm showing you now is Exhibit 9.</p> <p>9 And this is the online version of the City Pages</p> <p>10 article; is that correct?</p> <p>11 A Yes.</p> <p>12 Q And it's the same City Pages article that</p> <p>13 is the basis for several of your defamation</p> <p>14 allegations; is that true?</p> <p>15 A Yes.</p> <p>16 Q And this article was posted on February</p> <p>17 22nd, 2017, correct?</p> <p>18 A Yes.</p> <p>19 (Fredin Exhibit 10 was marked for</p> <p>20 identification.)</p> <p>21 BY MR. BREYER:</p> <p>22 Q So you've got the City Pages article in</p> <p>23 front of you there. I'm also giving you Exhibit 10.</p> <p>24 Exhibit 10 is the amended complaint that you filed in</p> <p>25 the lawsuit against Ms. Miller and Ms. Schaefer; is</p>	<p style="text-align: right;">Page 112</p> <p>1 responded very briefly. And she was forcibly trying</p> <p>2 to set up a date, and I stood her up. The intense,</p> <p>3 very odd text messages were coming from Catherine</p> <p>4 Schaefer attempting to force a date upon me in which</p> <p>5 I stood her up, at which point she became apparently</p> <p>6 very angry.</p> <p>7 At the time, however, I did not know this</p> <p>8 was Catherine Schaefer. It was a catfish profile.</p> <p>9 It was a very masculine dominant profile that I</p> <p>10 wasn't sure if it was male or female. I thought</p> <p>11 potentially it could be male. So I just didn't know</p> <p>12 who it was or anything related to that. And so the</p> <p>13 intense and odd text messages were Catherine</p> <p>14 Schaefer's.</p> <p>15 Q So it's that language, correct? Very odd,</p> <p>16 intense text messages that you find offensive?</p> <p>17 A I find them false.</p> <p>18 Q Okay. And the quotes around those words,</p> <p>19 that's Ms. Schaefer's opinion, not yours, correct,</p> <p>20 that the text messages were very odd and intense?</p> <p>21 A They were -- as far as I know, Michael</p> <p>22 Mullen pulled those from his own mind. He produced</p> <p>23 those out of nowhere.</p> <p>24 Q So that's Mr. Mullen's expression, not</p> <p>25 Ms. Schaefer's?</p>
<p style="text-align: right;">Page 111</p> <p>1 that accurate?</p> <p>2 A Yes.</p> <p>3 Q Okay. And if you turn to page 3 -- I'm</p> <p>4 sorry. Turn to page 10 of this document. On</p> <p>5 paragraph 38 you begin to describe the City Pages</p> <p>6 article and those portions of the article that you</p> <p>7 deem offensive or defamatory; is that accurate?</p> <p>8 A Yes.</p> <p>9 Q Okay. And in paragraph 38 you go through</p> <p>10 and quote portions of the article that you claim are</p> <p>11 defamatory and then below it you write "truth" and</p> <p>12 then give your version of the events; is that</p> <p>13 correct?</p> <p>14 A Yes.</p> <p>15 Q So falsehood 1 states, "Before they met in</p> <p>16 person, Fredin sent a series of 'very odd' and</p> <p>17 intense texts. Schaefer decided a meeting was 'not</p> <p>18 in her best interests.'" Do you see that?</p> <p>19 A Yes.</p> <p>20 Q What was defamatory about that particular</p> <p>21 paragraph?</p> <p>22 A Everything.</p> <p>23 Q Be specific.</p> <p>24 A The text speaks for itself. Catherine</p> <p>25 Schaefer sent repeated obsessive e-mails to me. I</p>	<p style="text-align: right;">Page 113</p> <p>1 A Plainly reading the article that's the way</p> <p>2 that I read it.</p> <p>3 Q Okay. And moving on to falsehood</p> <p>4 number 2, it says, "Defendant Schaefer canceled and</p> <p>5 told Fredin to stop contacting her." Do you see</p> <p>6 that?</p> <p>7 A I do.</p> <p>8 Q That's also Mr. Mullen's words, not</p> <p>9 Ms. Schaefer's, correct?</p> <p>10 A I don't know if that was Michael Mullen or</p> <p>11 Catherine Schaefer.</p> <p>12 Q Let's move on to number 3. It says, "Over</p> <p>13 the next two years, she" -- being Ms. Schaefer --</p> <p>14 "was contacted dozens of times by unfamiliar</p> <p>15 cellphone numbers and online dating profiles. In</p> <p>16 longer communiqués, Schaefer recognized Fredin's</p> <p>17 unique writing style, she wrote in her affidavit.</p> <p>18 Other messages just said, 'Hi Cat'."</p> <p>19 No one else called her that. Do you see</p> <p>20 that?</p> <p>21 A Yes.</p> <p>22 Q Okay. Are those Mr. Mullen's words or are</p> <p>23 those Ms. Schaefer's words?</p> <p>24 A I believe that they're both Mr. Mullen and</p> <p>25 Catherine Schaefer.</p>

<p style="text-align: right;">Page 114</p> <p>1 Q Okay. Which words are Ms. Schaefer's?</p> <p>2 A The, quote, unquote, unique writing style</p> <p>3 and then the, quote, unquote, Hi Cat.</p> <p>4 Q Okay. What is defamatory by</p> <p>5 characterizing the writing style as unique?</p> <p>6 A The unique writing style references</p> <p>7 unfamiliar dating profile contact, unfamiliar</p> <p>8 cellphone contact. That was extrapolated from her</p> <p>9 affidavits, as well as her own statements to Michael</p> <p>10 Mullen that were categorical false.</p> <p>11 Q Focus on the three words, "unique writing</p> <p>12 style."</p> <p>13 A Right.</p> <p>14 Q There's a nothing offensive about that</p> <p>15 statement, what you're finding offensive is that</p> <p>16 there was other activity surrounding this, correct?</p> <p>17 A Catherine Schaefer had stated to</p> <p>18 Mr. Mullen that she had received contact, quote,</p> <p>19 unquote, dozens of times by unfamiliar cellphone</p> <p>20 numbers. I don't know if that's in the transcript or</p> <p>21 an affidavit.</p> <p>22 Q Okay.</p> <p>23 A But that's her statement to Mr. Mullen</p> <p>24 that is additionally defamatory and categorically</p> <p>25 false.</p>	<p style="text-align: right;">Page 116</p> <p>1 A She's referencing the fact that she</p> <p>2 received messages using "Hi Cat", which simply never</p> <p>3 happened.</p> <p>4 Q So it's just not true; it's not that it's</p> <p>5 defamatory, correct?</p> <p>6 A Well, it paints me in a negative light, so</p> <p>7 therefore it is defamatory claiming that I have sent</p> <p>8 messages which I have not, you know, making me out to</p> <p>9 be like an online stalker or a stalker in general,</p> <p>10 which simply was later found to be false. And, I</p> <p>11 mean -- later found to be false, I knew it was false,</p> <p>12 but it was later proven false by the St. Paul Police</p> <p>13 Department.</p> <p>14 Q Again, my question is around your</p> <p>15 identification of "Hi Cat" as being offensive. I</p> <p>16 want to understand that because I think what you're</p> <p>17 saying is it's simply not true, not that it's</p> <p>18 defamatory, somehow it has ruined your reputation for</p> <p>19 having been associated with the phrase "Hi Cat"?</p> <p>20 A The "Hi Cat" is a reference to receiving</p> <p>21 unsolicited messages from me or that I was somehow</p> <p>22 targeting her on the internet by continuing to pursue</p> <p>23 her which -- you know, painting me in a light of</p> <p>24 being an online harasser, which is defamatory.</p> <p>25 Q You've used that phrase with her, though,</p>
<p style="text-align: right;">Page 115</p> <p>1 Q In that sentence she doesn't make any</p> <p>2 reference to you, does she?</p> <p>3 A Yeah. She said she recognized Fredin,</p> <p>4 which is a reference to me.</p> <p>5 Q Claiming you had a unique writing style,</p> <p>6 correct?</p> <p>7 A Yeah.</p> <p>8 Q Okay. So the unique writing style is not</p> <p>9 the offensive language. It's the preceding sentence</p> <p>10 talking about the fact that she had received</p> <p>11 unfamiliar cellphone numbers and online dating</p> <p>12 profiles, correct?</p> <p>13 A Generally.</p> <p>14 Q Okay. And then the "Hi Cat", there's</p> <p>15 nothing offensive about that, is there?</p> <p>16 A Yeah, because I never sent an e-mail --</p> <p>17 it's insane. I mean, she's just taking random text</p> <p>18 messages or dating profile communications and</p> <p>19 claiming it's me and it was later found to be totally</p> <p>20 false before producing it in the City Pages article</p> <p>21 that ruined my life.</p> <p>22 Q So I'm focusing on specifically the</p> <p>23 language of the City Pages article that you claim is</p> <p>24 defamatory. You've identified "Hi Cat," and I want</p> <p>25 to understand why that's defamatory.</p>	<p style="text-align: right;">Page 117</p> <p>1 before, "Hi Cat"?</p> <p>2 A No.</p> <p>3 Q And there's no communication between you</p> <p>4 and her where you used that phrase?</p> <p>5 A Correct. I don't know -- I didn't know</p> <p>6 who she was.</p> <p>7 Q Falsehood number 4 says, "Exasperated,</p> <p>8 Schaeffer took to Facebook, detailed how a guy she</p> <p>9 never met was haunting her. A friend shared her</p> <p>10 post. Another Twin Cities woman soon reached out.</p> <p>11 Schaefer wasn't Fredin's only victim." Correct?</p> <p>12 A Yes.</p> <p>13 Q The statement that "another Twin Cities</p> <p>14 woman soon reached out, Schaefer wasn't Fredin's only</p> <p>15 victim," those are Mr. Mullen's words, correct?</p> <p>16 A I believe it's a combination of statements</p> <p>17 by Catherine Schaefer to Mr. Mullen or Mr. Mullen's</p> <p>18 statements himself.</p> <p>19 Q Well, you've got the article sitting next</p> <p>20 to you.</p> <p>21 A Okay.</p> <p>22 Q Tell me what in its context you believe is</p> <p>23 her words as opposed to Mr. Mullen's. So if you look</p> <p>24 on page 2 of the article, for instance --</p> <p>25 A Yeah, I see it.</p>



<p style="text-align: right;">Page 118</p> <p>1 Q Okay. There's no quotes around any of</p> <p>2 those words, correct?</p> <p>3 A That's true.</p> <p>4 Q So none of those quotes are associated or</p> <p>5 attributed to Ms. Schaefer?</p> <p>6 A Mr. Mullen would not have knowledge of</p> <p>7 that statement without having talked to Catherine</p> <p>8 Schaefer. I'm not sure how Mr. Mullen would know</p> <p>9 Schaefer took to Facebook, for example, which is</p> <p>10 second through fifth word in that paragraph.</p> <p>11 Q Well, maybe this will help, Mr. Fredin.</p> <p>12 If you move down to falsehood number 5, you'll find</p> <p>13 that on the very top page of page 3 of the article,</p> <p>14 which is Exhibit 9.</p> <p>15 A Okay.</p> <p>16 Q Okay? Can you read that to yourself?</p> <p>17 A Sorry. Which paragraph?</p> <p>18 Q The very first one. The very first at the</p> <p>19 top of the page. It says, "The messages, some</p> <p>20 sexually suggestive, continued for weeks. 'Get on</p> <p>21 your knees and think of me,' he wrote, according to</p> <p>22 the ruling."</p> <p>23 Do you know what ruling is referenced</p> <p>24 here?</p> <p>25 A Actually, I do not.</p>	<p style="text-align: right;">Page 120</p> <p>1 A Yeah, but he can be paraphrasing the</p> <p>2 statements Ms. Schaefer gave to Mr. Mullen.</p> <p>3 Q Right. So they're Mr. Mullen's words</p> <p>4 paraphrasing something Ms. Schaefer would have said?</p> <p>5 A I don't know. It sounds like Ms. Schaefer</p> <p>6 gave those statements to Mr. Mullen. I just don't</p> <p>7 know. I had no knowledge of this article being</p> <p>8 constructed, so I have no idea.</p> <p>9 Q Well, you're making allegations in this</p> <p>10 lawsuit that these statements were hers and that they</p> <p>11 were defamatory.</p> <p>12 A Correct. Yes.</p> <p>13 Q Are you saying you're mistaken?</p> <p>14 A No.</p> <p>15 Q So how do you attribute the statements in</p> <p>16 the article, specifically falsehood number 7, to</p> <p>17 Ms. Schaefer? What basis do you have to make this</p> <p>18 allegation?</p> <p>19 A Recent FOIA request information which</p> <p>20 sheds light on the fact that Catherine Schaefer was</p> <p>21 contacting the City Pages at least at the time of</p> <p>22 January 24th, 2017. And so the evidence here</p> <p>23 indicates that Catherine Schaefer -- there was an</p> <p>24 admission that Catherine Schaefer contacted the City</p> <p>25 Pages and NPR. Not NPR, but M as in Mary, so</p>
<p style="text-align: right;">Page 119</p> <p>1 Q It's a court ruling, correct?</p> <p>2 A Yes.</p> <p>3 Q And so those words, those statements, came</p> <p>4 from a court ruling according to the article,</p> <p>5 correct? I mean, it says according to the ruling,</p> <p>6 correct?</p> <p>7 A I can't remember. I'd have to verify my</p> <p>8 records.</p> <p>9 Q The last falsehood, falsehood number 7</p> <p>10 here, you have stated, "Schaefer's evidence of</p> <p>11 unwanted contact through the years was overwhelming."</p> <p>12 And we find that language on page 3, third paragraph.</p> <p>13 A There's no page numbers on this article.</p> <p>14 Q Right. You're going to have to just count</p> <p>15 the pages. It's one paragraph down from where we</p> <p>16 were just looking at. It starts with "Hanson filed."</p> <p>17 A Okay. I see it.</p> <p>18 Q Those words are Mr. Mullen's words,</p> <p>19 correct? There's no quotations attributing those</p> <p>20 statements to Ms. Schaefer?</p> <p>21 A I'm not sure. I believe that Ms. Schaefer</p> <p>22 provided those statements to Mr. Mullen.</p> <p>23 Q Well, the statements she provided to</p> <p>24 Mr. Mullen are in quotes. There's no quotes around</p> <p>25 that sentence, is there?</p>	<p style="text-align: right;">Page 121</p> <p>1 Minnesota Public Radio.</p> <p>2 Q But that doesn't help us understand your</p> <p>3 allegation that she made this statement as opposed to</p> <p>4 Mr. Mullen.</p> <p>5 A The FOIA request from the City of</p> <p>6 Minneapolis indicates that Lindsey Middlecamp and</p> <p>7 Catherine Schaefer apparently had communicated with</p> <p>8 the City Pages in an effort to make statements to</p> <p>9 Mr. Mullen, so I believe that it's a combination</p> <p>10 therein of both Mr. Mullen and Catherine Schaefer.</p> <p>11 Q But you don't know what statements were</p> <p>12 provided to Mr. Mullen? Your FOIA request didn't</p> <p>13 discover that?</p> <p>14 A It said -- yeah, I mean, it was very</p> <p>15 specific. It said that Catherine Schaefer had made</p> <p>16 allegations of unwanted contact over many years,</p> <p>17 which was totally bogus. But that was in the FOIA</p> <p>18 request.</p> <p>19 Q Your request and their response?</p> <p>20 A I'm sorry. Yes, you're right, Mr. Breyer.</p> <p>21 That was in the production provided by way of the</p> <p>22 City of Minneapolis.</p> <p>23 Q Okay. And whose statements were those</p> <p>24 that you just recited to me?</p> <p>25 A Those statements were directly from</p>

<p style="text-align: right;">Page 122</p> <p>1 Lindsey Middlecamp referencing her own conversation 2 with Ms. Schaefer. And because she was referencing a 3 direct conversation with Ms. Schaefer, it is my 4 belief that it is not hearsay. 5 Q Well, I don't care if it's hearsay or not. 6 I'm trying to understand what on the basis of the 7 response leads you to believe that the words we just 8 reviewed are Ms. Schaefer's as opposed to 9 Mr. Mullen's? 10 A I truly feel it's a combination of 11 Ms. Schaefer's false statements to Mr. Mullen 12 directly without citing any record in Ramsey County 13 District Court as well as Mr. Mullen's statements 14 paraphrasing those statements and him adding 15 additional information himself to extrapolate without 16 citations to the court record. 17 MR. BREYER: Why don't we take a short 18 break for lunch and then we'll come back. 19 THE WITNESS: Okay. 20 (Whereupon, at 12:37 p.m. a lunch recess 21 was taken.) 22 23 24 25</p>	<p style="text-align: right;">Page 124</p> <p>1 Q Okay. You did a full search of those -- 2 of both of those e-mail accounts? 3 A Yes. 4 Q And did you retrieve any documents from 5 those accounts that you produced to us? 6 A I believe so. 7 Q Did you withhold any documents from those 8 accounts that you reviewed in production? 9 A To the best of my knowledge, I did not. I 10 will do a second search to ensure that I have not 11 withheld any documents. 12 Q The process to search those two accounts, 13 was it the same method of searching you described 14 earlier using keywords? 15 A Yes. 16 Q Did you use the same keywords? 17 A Yes. 18 Q When you did the search for the e-mail 19 accounts, you did so presumably using a laptop that 20 you currently use? 21 A Actually, I was at a law library. 22 Q Okay. Do you have any other devices other 23 than the five phones you described earlier that would 24 contain e-mails or other documents related to this 25 case or these cases?</p>
<p style="text-align: right;">Page 123</p> <p>1 AFTERNOON SESSION 2 (1:20 p.m.) 3 ***** 4 Whereupon, 5 BROCK FREDIN, 6 the witness testifying at the time of 7 recess, having been previously duly sworn, 8 was further examined and testified as 9 follows. 10 ***** 11 EXAMINATION RESUMED BY COUNSEL FOR THE DEFENDANTS 12 BY MR. BREYER: 13 Q So, Mr. Fredin, we're back on the record 14 after a break for lunch. I'll remind you you're 15 still under oath. Do you understand that? 16 A Yes. 17 Q In addition to the brockf12@gmail.com 18 account you also referenced two other e-mail accounts 19 today, the Baron Tharson account and a Field.gator 20 account. Do you recall that testimony? 21 A I do. 22 Q Okay. When you searched for responsive 23 e-mails and other documents, did you search those 24 e-mail accounts as well? 25 A Yes.</p>	<p style="text-align: right;">Page 125</p> <p>1 A I have documents in a number of file 2 folders. 3 Q And were those file folders searched in 4 response to our requests? 5 A Yes and no. I mean, there's so many 6 documents that it would be exhaustive. I relied upon 7 digital documents that I could find that were 8 reproductions of those documents. 9 Q Okay. Why do you have reproductions of 10 those documents as opposed to the original document? 11 A Because those files are in storage and 12 there are so many documents. I'm one person. I 13 can't possibly go through each and every document, 14 whereas a keyword search avails that information 15 quickly. 16 Q When you say they're in storage, are they 17 in the storage unit you described earlier? 18 A Yes. 19 Q Okay. And you have access to that storage 20 unit? 21 A I do. 22 Q And where is it located? 23 A The storage unit has been located in 24 St. Louis Park. 25 Q When was the last time you were at the</p>

<p style="text-align: right;">Page 126</p> <p>1 storage unit?</p> <p>2 A Probably August.</p> <p>3 Q Other than the five phones you described</p> <p>4 earlier, what other electronic devices may be in that</p> <p>5 storage unit?</p> <p>6 A That's really a -- that's all I know.</p> <p>7 Q I'm sorry. Did you give me a number?</p> <p>8 A No. That's about it. That's all I can</p> <p>9 recall that is associated with documents.</p> <p>10 Q So there are no computers of any type?</p> <p>11 A Correct.</p> <p>12 Q Okay. Did you search any of your</p> <p>13 computers or did you only use the computer at the law</p> <p>14 library?</p> <p>15 A I did search using a phone that I had.</p> <p>16 And then when I was at the law library forwarded some</p> <p>17 of the documents to the brockf12 account in order to</p> <p>18 use their resources, essentially, to produce the</p> <p>19 PDFs.</p> <p>20 Q From January of 2016 to present, what</p> <p>21 computers, if any, have you used to communicate</p> <p>22 either through Collarspace or these other online</p> <p>23 profiles or the e-mails addresses that you provided?</p> <p>24 A The iMac that I had that was seized</p> <p>25 pursuant to Lindsey Middlecamp's unlawful actions</p>	<p style="text-align: right;">Page 128</p> <p>1 earlier. Now I want to talk about a third one called</p> <p>2 EpicViewf12. Are you familiar with that profile?</p> <p>3 A So I think that's the same profile as the</p> <p>4 EpicViewfu.</p> <p>5 Q Okay.</p> <p>6 A There's just a name issue with it. I</p> <p>7 believe that it's F12 was the actual name. And I</p> <p>8 don't know how the FU came about, if maybe -- I</p> <p>9 believe that it was always EpicView F12 because</p> <p>10 that's a derivative of my e-mail address which is</p> <p>11 brockf12.</p> <p>12 Q Okay. Are the profiles -- is the profile</p> <p>13 for EpicViewf12 the same as EpicViewfu?</p> <p>14 A Yes.</p> <p>15 (Fredin Exhibit 11 was marked for</p> <p>16 identification.)</p> <p>17 BY MR. BREYER:</p> <p>18 Q So, Mr. Fredin, Exhibit Number 11, that's</p> <p>19 just been handed to you. You know what? Set that</p> <p>20 exhibit aside a moment. Let's do this one first.</p> <p>21 (Fredin Exhibit 12 was marked for</p> <p>22 identification.)</p> <p>23 BY MR. BREYER:</p> <p>24 Q Okay. Exhibit 12 is -- again, it appears</p> <p>25 to be one of these messages from collarspace.com. Is</p>
<p style="text-align: right;">Page 127</p> <p>1 against me and then -- that's pretty much it.</p> <p>2 Q Okay. And you haven't searched the iMac;</p> <p>3 is that correct?</p> <p>4 A I can't turn it on because the files have</p> <p>5 been compromised.</p> <p>6 Q Have you tried to turn it on?</p> <p>7 A No.</p> <p>8 Q When you refer to compromised files, again</p> <p>9 we're talking about the police seizure of that device</p> <p>10 as well with others?</p> <p>11 A I can't trust any devices that have been</p> <p>12 seized by law enforcement.</p> <p>13 Q And where is that iMac today?</p> <p>14 A I believe that it's in the storage unit.</p> <p>15 I'm sorry. I'm contradicting myself. It is in the</p> <p>16 storage unit. It's in storage. I'm not trying to</p> <p>17 intentionally mislead. There's so many devices, I'm</p> <p>18 just trying to associate specific devices to where</p> <p>19 they're at.</p> <p>20 Q Yeah. And if you want to correct the</p> <p>21 testimony, I'm perfectly fine doing that. I'd rather</p> <p>22 get your best recollection rather than your guess.</p> <p>23 A My best recollection is that it's in the</p> <p>24 storage unit.</p> <p>25 Q We talked about two Collarspace accounts</p>	<p style="text-align: right;">Page 129</p> <p>1 that correct?</p> <p>2 A Yes.</p> <p>3 Q And this one relates to the user name</p> <p>4 EpicViewf12. Is that also correct?</p> <p>5 A Yes.</p> <p>6 Q And it's messaging you at your user name</p> <p>7 at Collarspace, which was EpicView?</p> <p>8 A Correct.</p> <p>9 Q Okay. Is this the only message you</p> <p>10 received from EpicViewf12?</p> <p>11 A Generally there was -- it was between one</p> <p>12 and three messages. It could have been one, it could</p> <p>13 have been upwards of three. When I received the</p> <p>14 messages from BlackOutx2, I sort of mixed them</p> <p>15 together.</p> <p>16 Q So this is the one you produced to us and</p> <p>17 it says, "See you soon, Brock," and then your</p> <p>18 response is, "Do not contact me ever again." Do you</p> <p>19 see that?</p> <p>20 A Yes.</p> <p>21 Q Okay. So what other messages, if any, did</p> <p>22 you receive from EpicViewf12, or is this it?</p> <p>23 A There's another message that says -- I</p> <p>24 can't remember if it's from this one or the BlackOut</p> <p>25 profile, but it's like along a similar path of saying</p>

<p style="text-align: right;">Page 130</p> <p>1 did you check out the profile for taunting me. There  2 was between one and three messages between these two  3 profiles.  4 Q Okay. Now let's look back at Exhibit 11 I  5 just handed to you earlier. It's the one to your  6 right.  7 A Okay.  8 Q So Exhibit 11 appears to me to be the  9 profile for BlackOutx2; is that correct?  10 A Yes.  11 Q And this profile is -- correct me if I'm  12 wrong -- is exactly the same as the profile for  13 EpicViewf12 and EpicViewfu.  14 A No, that's not correct.  15 Q Okay. What is different about it?  16 A This -- I don't -- the EpicViewf12 profile  17 was made inactive shortly after these messages were  18 sent. I don't recall exactly what was in the  19 profiles themselves other than reviewing my records.  20 But what I do recall is that this profile was  21 different altogether from the EpicViewf12 profile.  22 Q Is it true to say that we don't have a  23 profile today of EpicViewf12?  24 A It exists, but it's publicly inactive and  25 appears to be a conduit in which Catherine Schaefer</p>	<p style="text-align: right;">Page 132</p> <p>1 these came and then she filed the restraining order  2 against me. So it was clearly Catherine Schaefer.  3 I mean, in addition to the fact that all  4 of my information was included here, the user name  5 itself was indicative of her blackout smear campaign,  6 and then, you know, these journal entries that were  7 publicly available that listed my name claiming that  8 I stalked and harassed women and that I was in  9 violation of a restraining order.  10 Q This is a two-page document. I want you  11 to point to me the specific language in this profile  12 that indicates that it's Catherine Schaefer.  13 A The entire profile itself is directly  14 linked to Catherine Schaefer. There is no other  15 person who would have created this.  16 Q Right. I want you to point me to --  17 A The entire profile content, every  18 single --  19 Q Every single word on this indicates that  20 it was Catherine Schaefer?  21 A Absolutely. Absolutely. Beyond a doubt.  22 Q But there's no content within this,  23 specific content, that would direct you to Catherine  24 Schaefer, only your belief that she put this entire  25 profile together, correct?</p>
<p style="text-align: right;">Page 131</p> <p>1 used simply to taunt me in order to persuade me to  2 view this profile.  3 Q Okay. So we don't have that profile  4 description because it hasn't been produced, correct?  5 You didn't produce that to us?  6 A I don't recall. I potentially did. I  7 will check my records.  8 Q Okay. But this is the profile in  9 Exhibit 11 for BlackOutx2?  10 A Correct.  11 Q Okay. And this you did produce to us?  12 A Yes.  13 Q So help me understand more of what we're  14 looking at in Exhibit 11. It's got the profile for  15 BlackOutx2 on the left and then it looks like there's  16 a posting to the right. Do you have any knowledge  17 whether that posting to the right is authored by  18 BlackOutx2 or by somebody else?  19 A It was clearly authored by Catherine  20 Schaefer.  21 Q Okay. Why do you say that?  22 A Because these taunting messages came at  23 the same time as her glitter bomb profile messages to  24 me. I rarely received messages and so Catherine  25 Schaefer's profile had communicated with me and then</p>	<p style="text-align: right;">Page 133</p> <p>1 A Her IP address is associated with it.  2 Q Where does her IP address show up?  3 A It is available through the site itself.  4 Q Have you requested the IP addresses from  5 the site?  6 A Yes, I did actually.  7 Q Okay. Do you have those in your  8 possession?  9 A I do not have them in my possession.  10 Q Why not?  11 A Because I don't have the -- or at the time  12 I didn't have the bandwidth to pursue fighting  13 through a subpoena to get the IP records.  14 Q So you never subpoenaed Collarspace and  15 you never received a log of IP addresses related to  16 this account, correct?  17 A That is true, yes.  18 Q So we don't know if her IP address is  19 associated with this profile or not?  20 A I'm a hundred percent sure that it's  21 Catherine Schaefer's IP address.  22 Q Okay. You say that, but I'm wondering if  23 it's not linked to any particular IP address because  24 you didn't subpoena those records, correct?  25 A Simply because I didn't subpoena doesn't</p>

<p style="text-align: right;">Page 134</p> <p>1 mean that the IP addresses are not linked to  2 Catherine Schaefer.  3 Q Okay. Do you have any documents that show  4 the IP addresses related to this account?  5 A Actually, so what happened is I did  6 receive certain network information when I -- who is  7 some of the smear campaign stuff that was out against  8 me that I included, like a couple of websites, and it  9 was all -- so what happened is the information that I  10 received back indicated that Catherine Schaefer was  11 viewing with her IP address -- and that's included in  12 some of these complaints.  13 For example, it was included in the motion  14 to dismiss opposition -- that Catherine Schaefer's IP  15 address was used to view information related to the  16 smear campaign, specifically like a honey pot website  17 that was set up was linked back to her location in  18 State College Pennsylvania as well as her IP address.  19 Q Okay. But I want you to focus on this  20 particular account, this BlackOutx2. You have no  21 documents, records or logs indicating that her IP  22 address is associated with this whatsoever, correct?  23 A I don't know how to answer your question.  24 I don't know.  25 Q Well, either you have a document that</p>	<p style="text-align: right;">Page 136</p> <p>1 A She had posted similar photos on her  2 Facebook at the same time.  3 Q But not this photo?  4 A Not that photo.  5 Q No? Okay. So because she was supportive  6 of that movement and she used -- and this particular  7 profile uses an African American, you assume that  8 it's Catherine Schaefer who posted it?  9 A No, I don't assume. I'm a hundred percent  10 sure that it was Catherine Schaefer.  11 Q So help me understand the hundred percent  12 sure. Is that a hundred percent sure feeling or a  13 hundred percent sure because you have some evidence  14 or documents that indicated it was her?  15 A I have a bunch of evidence produced in  16 discovery that indicates that this is from Catherine  17 Schaefer.  18 Q Okay. And tell me what that evidence is.  19 A IP addresses related to the smear  20 campaign. I have, you know, hundreds of these  21 e-mails.  22 Q You say you have --  23 A I have hundreds of tweets that are revenge  24 pornography-based from CardsAgstHrsmt. I think  25 that's -- another element of this is the fact that</p>
<p style="text-align: right;">Page 135</p> <p>1 shows her IP address associated with this or you  2 don't. You certainly didn't produce anything to us.  3 I'm wondering whether you have the document or not?  4 A I would really have to review my records  5 to ensure -- the IP address I have is associated with  6 Catherine Schaefer and is related to the smear  7 campaign as a whole.  8 Q But, again, I want you to focus on purely  9 the Collarspace profiles.  10 A Right. Yeah. So I didn't subpoena this  11 website, but this content could only have been  12 created by Catherine Schaefer. It's indicative of  13 Catherine Schaefer during the same time period  14 Catherine Schaefer had been posting a lot about  15 "Black Lives Matter" on Facebook and there's a photo  16 of two -- it's a black couple engaging in some sort  17 of romance.  18 Q So that leads you to believe --  19 A It's clearly Catherine Schaefer.  20 Everything about it. The messages that were sent  21 directly after Catherine Schaefer had messaged me  22 with her profile and which she admitted to  23 possessing. Yeah.  24 Q So just so I'm clear, so she was  25 supportive of "Black Lives Matter"; is that right?</p>	<p style="text-align: right;">Page 137</p> <p>1 the revenge porn campaign that Lindsey Middlecamp  2 produces on CardsAgstHrsmt is eerily almost if not  3 identical to this sort of conduct.  4 For example, this is a shirtless black  5 man.  6 Q All right. So let's back up and try this  7 again. How did you capture Ms. Schaefer's IP  8 address?  9 A I received data from an analytics service.  10 Q Which service?  11 A Google Analytics. Showing that HTTP  12 requests made to retrieve data were made, in  13 reference to this whole smear campaign, were made  14 from State College, Pennsylvania, and it indicated  15 her IP address at the same time that all of this was  16 going down.  17 Q Well, you made the -- so Google Analytics  18 ran or captured the IP address related to what  19 communication or website?  20 A I believe that it was a website dorseyhq  21 or lindseymiddlecamp.com.  22 Q And those are websites that you created,  23 correct?  24 A That's false.  25 Q Well, how did you get the Google Analytics</p>



<p style="text-align: right;">Page 138</p> <p>1 if they weren't websites that you had control over?</p> <p>2 A I received the information by way of a</p> <p>3 friend, but I did not have direct knowledge of any</p> <p>4 intentions or actions related to any websites going</p> <p>5 up.</p> <p>6 Q Who's the friend?</p> <p>7 A I'm not going to answer that question.</p> <p>8 Q Why not?</p> <p>9 A Because it's not relevant.</p> <p>10 Q Well, you just described for me how you</p> <p>11 obtained the IP address of my client through a</p> <p>12 friend. I'd like to know the friend's name.</p> <p>13 A Right. And I'm not going to answer that</p> <p>14 question.</p> <p>15 Q Well, Mr. Fredin, you're making a claim</p> <p>16 that Ms. Schaefer created these false profiles</p> <p>17 because you believe that her IP address is associated</p> <p>18 with them. You then tell me that the IP address was</p> <p>19 obtained through two websites, lindseymiddlecamp.com</p> <p>20 and dorseyhq, for which you say you don't control but</p> <p>21 that are controlled by a, quote, unquote, friend.</p> <p>22 So I'll ask you again, who's the friend?</p> <p>23 A I did a search of these websites. They</p> <p>24 don't exist. Dorseyhq doesn't exist.</p> <p>25 Lindseymiddlecamp doesn't exist.</p>	<p style="text-align: right;">Page 140</p> <p>1 giving you another opportunity if you'd like to</p> <p>2 disclose the name of your friend which you're legally</p> <p>3 required to do, I hope you do it now. Who's the</p> <p>4 friend?</p> <p>5 A You mentioned content harmful to your</p> <p>6 client, yet your client has refused and destroyed my</p> <p>7 life on CardsAgstHrsmt, the City Pages, everywhere,</p> <p>8 and yet you claim a website that doesn't exist is</p> <p>9 somehow providing harmful content to your client.</p> <p>10 The website does not exist. So --</p> <p>11 Q Mr. Fredin --</p> <p>12 A And it's not relevant to this action</p> <p>13 whatsoever. So, again, if you find, you know, reason</p> <p>14 to, you know, try and offer intimidation tactics to</p> <p>15 claim somehow that your client is being harmed when</p> <p>16 your client is in fact destroying me, the only thing</p> <p>17 that I can remember is Lindsey Middlecamp's</p> <p>18 destruction of my life. And so I am objecting on</p> <p>19 relevance to any other content where you're trying to</p> <p>20 misdirect the intent of this lawsuit.</p> <p>21 I am the plaintiff in this lawsuit against</p> <p>22 your clients. Your clients have harmed me. So</p> <p>23 there's no basis or relevance whatsoever for your</p> <p>24 question.</p> <p>25 Q Mr. Fredin, you've testified -- you</p>
<p style="text-align: right;">Page 139</p> <p>1 Q It did, because you just told me it did.</p> <p>2 A But it doesn't exist. And the information</p> <p>3 I received was simply for legal purposes to track</p> <p>4 down through private investigators Catherine</p> <p>5 Schaefer's involvement.</p> <p>6 Q Who developed the site dorseyhq and</p> <p>7 lindseymiddlecamp.com?</p> <p>8 A I will object on relevance.</p> <p>9 Q They were created by Anthony Zappin,</p> <p>10 correct?</p> <p>11 A Again, I'm objecting on relevance.</p> <p>12 Q You and Mr. Zappin collaborated on the</p> <p>13 creation of those websites and other websites, true?</p> <p>14 A I'm objecting on relevance.</p> <p>15 Q You're refusing to answer the question as</p> <p>16 to who created the website dorseyhq and</p> <p>17 lindseymiddlecamp.com; is that correct?</p> <p>18 A I'm objecting on relevance. I'm not</p> <p>19 refusing to answer.</p> <p>20 Q Well, Mr. Fredin, there's a website with</p> <p>21 my client's name attached to it along with some</p> <p>22 harmful information contained within it. How it's</p> <p>23 not relevant, I don't understand. But if you're</p> <p>24 going to maintain the objection and not answer we can</p> <p>25 certainly certify that question to the Court. So I'm</p>	<p style="text-align: right;">Page 141</p> <p>1 testified. I didn't offer you this information. You</p> <p>2 testified as to both of these websites that existed.</p> <p>3 Now whether they exist today or not is not my</p> <p>4 question. The question is who did you collaborate to</p> <p>5 create the websites?</p> <p>6 A I testified that analytical information</p> <p>7 was produced in the complaint or the amended</p> <p>8 complaint and/or the opposition on motion to dismiss.</p> <p>9 And that information pertained to IP addresses.</p> <p>10 That's all I'm testifying to.</p> <p>11 Q Right. And I want you to tell me the</p> <p>12 source of that information which you identified as</p> <p>13 your friend. Your friend's name is who?</p> <p>14 A I conducted a private investigation</p> <p>15 through attorneys to determine, you know, IP</p> <p>16 addresses associated and data therein.</p> <p>17 Q Which attorneys?</p> <p>18 A I'm going to object on attorney-client</p> <p>19 privilege.</p> <p>20 Q The name of the attorneys is not covered</p> <p>21 by the privilege. The identification of the</p> <p>22 attorneys, please.</p> <p>23 A The only thing that I can tell you with</p> <p>24 reference to the identification of the attorney is</p> <p>25 the fact that I retained at least two lawyers during</p>

<p style="text-align: right;">Page 142</p> <p>1 this entire process and those lawyers' names are  2 included in all of the discovery that I've produced,  3 including the City Pages article. And so those names  4 have been provided and I'm not in any way violating  5 attorney-client privilege.  6 Q I'm not asking you to violate the  7 privilege. I'm asking just for the names of the two  8 attorneys that you claim --  9 A I produced those names. Those names are  10 very easy to determine --  11 Q Do you not recall their names?  12 A I do recall their names.  13 Q What are they?  14 A The only reason that I am objecting on  15 attorney-client privilege is because I will have to  16 review whether or not the names or identities of  17 those lawyers are provided -- or covered, rather, by  18 attorney-client privilege. If they're not, then I'll  19 answer your question as soon as I possibly can.  20 However, it's pretty obvious to find from notices of  21 appearances and so forth.  22 Q Right. So why wouldn't you just tell me  23 their names?  24 A Because I'd have to review whether or not  25 the names or identities are included to determine</p>	<p style="text-align: right;">Page 144</p> <p>1 created this website or not?  2 A Correct.  3 Q You provided content to this website,  4 true?  5 A I'm objecting on relevance.  6 Q You had assistance in creating this  7 website with the friend that you won't identify. Is  8 that also true?  9 A I'm objecting on relevance.  10 Q Well, Mr. Fredin, I don't take your  11 relevancy objections very well, especially since  12 they're dealing with the direct content of the claims  13 in this lawsuit, including my client, Grace Miller.  14 So if you're going to continue that objection then  15 we'll simply go to the Court and get some redress.  16 But for now I need to know whether you participated  17 in the creation of the content of this website.  18 A It appears to show a masculine woman who  19 looks like my ex-girlfriend, Grace Miller.  20 Q The question was did you participate in  21 the content of this website, yes or no?  22 A I see the photo of Grace Miller whose  23 masculinity I was attracted to. I see Karmen  24 McQuitty's ex parte communication to her mother  25 defaming and taunting me on Facebook. Yet Karmen</p>
<p style="text-align: right;">Page 143</p> <p>1 whether or not I am in full compliance.  2 Q Well, you just told me they're on filings.  3 A They are. It's public.  4 Q So they've already been disclosed, it's  5 public. So I'm just asking you for that public  6 information. What are their names?  7 A I don't know if names are protected by  8 attorney-client privilege.  9 Q Okay. Let's go back to the friend,  10 because your friend is not a lawyer. What's your  11 friend's name that set up these websites?  12 A Again, I'm objecting on relevance. I'm  13 not going to answer that question.  14 Q Okay.  15 (Fredin Exhibit 13 was marked for  16 identification.)  17 BY MR. BREYER:  18 Q Mr. Fredin, I've handed you what's been  19 marked as Exhibit 13. And this is a website that was  20 created around Ms. Grace Miller. Have you seen this  21 website before?  22 A I have seen it.  23 Q Did you create it?  24 A I'm objecting on relevance.  25 Q You won't answer the question whether you</p>	<p style="text-align: right;">Page 145</p> <p>1 McQuitty and my ex-girlfriend, United States Air  2 Force Major Grace Miller, is using, according to this  3 content, restraining orders to silence and gag me  4 while at the same time defaming and taunting me,  5 which is ridiculous. That's all I'm seeing from this  6 content here.  7 I don't know if this content that you're  8 producing is identical to what I've seen in court  9 filings. When I say that I've seen this website,  10 this is a website that I've seen in court filings.  11 Q Right. So back to my question. Did you  12 contribute to the content of this website contained  13 in Exhibit 13, yes or no?  14 A I'm objecting on relevance. I have no  15 understanding of how this is relevant to the claims  16 in this action.  17 Q You're refusing to answer?  18 A I'm not refusing to answer. I am  19 objecting on relevance.  20 Q Sure you are. Right. You've objected on  21 relevance and now you can answer the question. Did  22 you participate in the content of this website?  23 A I'm not going to answer this question.  24 Q There are numbered pages in this document  25 and if you turn to pages 6, 7, 8, 9, so start with</p>